

DOCKET NO.: FBT-CV15-6048078-S

: SUPERIOR COURT

JONATHAN SHAPIRO

: JUDICIAL DISTRICT OF  
FAIRFIELD

PLAINTIFF

V.

: AT BRIDGEPORT

FRANK DELBOUNO, JR.  
and CITY OF BRIDGEPORT

: OCTOBER 20, 2015

DEFENDANTS

**PLAINTIFF'S SUPPLEMENTAL DISCLOSURE OF EXPERT WITNESS**

Pursuant to Practice Book §13-4, et seq., the plaintiff, Jonathan Shapiro, hereby supplements the disclosure of expert witnesses whom he expects to call at the time of trial, as well as documents and records he may submit into evidence in lieu of the live testimony of expert witnesses.

**1. Dr. Pardeep K. Sood, Pain Management Specialist, Spine and Pain Specialists of Connecticut, 5520 Park Avenue, #303, Trumbull, CT 06611**

A. The subject matter on which the expert is expected to testify:

If called to testify or introduced through the medical records, it is anticipated that Dr. Sood will testify, consistent with the medical records, concerning the diagnosis, findings, treatment, and prognosis with respect to the plaintiff's injuries

and conditions, as well as the causal relation of same to the incident alleged in the Complaint.

Dr. Sood will testify as to the plaintiff's physical condition during examination and treatment between March 19, 2014 and June 5, 2015 (as well as any subsequent treatment). Dr. Sood will testify that, inter alia, the plaintiff suffers from facetogenic neck pain as a result of the incident alleged in the Complaint.

If called to testify, it is expected that Dr. Sood will testify that the plaintiff, as a result of his injuries from the incident alleged in the Complaint, will require future treatment, including repeat cervical radiofrequency neuroablation, as well as the expected costs for the same.

Dr. Sood is also expected to testify, consistent with his medical reports and records, that the plaintiff suffered a 7% to 8% impairment of the cervical spine as a result of his injuries sustained in this incident.

B. The substance of the facts and opinions to which the expert may be expected to testify:

If called to testify, Dr. Sood will testify that the plaintiff's injuries and conditions, treatment, physical condition, mental condition, pain and suffering, including limitations and restrictions and resulting effects, including permanent

effects thereof, were caused and/or aggravated by the incident alleged in the Complaint and that the treatment was reasonable with respect to prevailing medical costs in the community. Dr. Sood will also testify in accordance with the medical reports that have been supplied through discovery, as well as with the results of his examination and treatment of the plaintiff and review of his medical records.

Dr. Sood will also testify about the plaintiff's prognosis and will further testify that the plaintiff will require treatment in the future. Dr. Sood is also expected to testify about the likelihood of future treatment and the expected frequency and cost of such future treatment.

Dr. Sood is also expected to testify, consistent with his medical reports and records, that the plaintiff suffered a 7% to 8% impairment of the cervical spine as a result of his injuries sustained in this incident.

C. Summary of the grounds for each opinion of the expert:

The opinions of Dr. Sood will be based upon the following: the history, examination, treatment, review of medical records and/or opinions of other medical practitioners regarding the plaintiff, Dr. Sood's evaluation of the plaintiff and his own education, training, knowledge and experience.

THE PLAINTIFF

By: 

Kevin C. Shea  
Clendenen & Shea, LLC  
400 Orange Street  
New Haven, Connecticut 06511  
203/787-1183

CERTIFICATION:

This is to certify that a copy of the foregoing was sent via e-mail to Russell D. Liskov, Associate City Attorney, Office of the City Attorney on October 20, 2015, at

[Russell.Liskov@bridgeportct.gov](mailto:Russell.Liskov@bridgeportct.gov)

  
CLENDENEN & SHEA, LLC